

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

No. 04-10129-RCL

NICHOLAS ANASTASIADES

MOTION TO AMEND CONDITIONS OF PRE-TRIAL RELEASE

Now comes the defendant, Nicholas Anastasiades and asks this honorable court to amend his conditions of pre-trial release by allowing him to travel from Boston, Massachusetts to Myrtle Beach, South Carolina. In support thereof the defendant travel plans would have him leave from Boston, Massachusetts on Thursday, May 12, 2005 and arrive in Myrtle Beach that same day at 6:49 p.m. The defendant will be traveling on U.S. Airways flights 856 and 1464 on Thursday, May 12 2005.

The defendant is scheduled to return to Boston on Monday, May 16, 2005. On the 16th the defendant is scheduled to leave Myrtle Beach at 7:25 p.m. and arrive in Boston at 11:12 p.m. The defendant will be traveling on U.S. Airways flights 454 and 1481 on the 16th of May. On both the 12th and 16th the defendant will be changing plans in Charlotte, North, Carolina.

The defendant states that he is going on a golf outing/vacation with family and friends and will be staying the Myrtle Beach area the entire time.

In support of this motion, counsel states that Assistant United States Attorney, Michael Pelgro, who is the prosecuting attorney on this case, has assented to this motion as well as the defendant's pre-trial services officer, Basil Cronin.

The defendant respectfully asks this honorable court to allow its' motion.

Respectfully submitted
By: Nicholas Anastasiades

James P. Geraghty
Jones & Milligan
80 Washington Square
Building J
Norwell, Ma 02061